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CERTIFIED MAIL **Return Receipt Requested**

Director of the Oregon Department of
Administrative Services
Executive Building
155 Cottage Street NE
Salem, OR 97301

Director of the Oregon Department of
Administrative Services
PO Box 12009
Salem, OR 97309-0009

Oregon Department of Corrections
Attn: Legal Claims Department
2575 Center Street NE
Salem, OR 97301

Re: Death of Michael Thomas Barton

Dear Sir or Madam:

We write to provide you with notice pursuant to ORS 30.275(2)(a) that the Estate of Michael Thomas Barton intends to file a wrongful death action arising out of the acts and omissions that occurred at the Oregon State Penitentiary. Mr. Barton died while in custody on February 6, 2018. During the prior month, he had developed symptoms of a viral illness consistent with the flu. Personnel at the penitentiary ignored his pleas for adequate treatment and his deteriorating condition, which resulted in his loss of consciousness and his death. A claim for damages will be asserted against the Oregon Department of Corrections, the Oregon State Penitentiary, and potentially other public bodies.

The proposed personal representative, Mr. Barton's brother Stephen Brown, only recently learned about the tortious conduct that led to his brother's death when he learned about ODOC personnel and inmates who had recently come forward with information about the situation.

We are preparing a legal Complaint and related documents. Please send all correspondence concerning the claim to me at the above address.

Very truly yours,



Bryan W. Dawson

BWD/sw
cc: Stephen Brown

PLAINTIFF'S
EXHIBIT

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